

FRONTIER SCHOOL CORPORATION

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December 30, 2013

REQUEST FOR REVIEW

CC Docket No 02-6

E-Rate Appeal Filed Electronically via the FCC ECFS System

Marlene H. Dortch, Secretary

Federal Communications Commission

Office of the Secretary

445 12th Street SW

Washington, DC 20554

Information

Applicant Name:	Frontier School Corporation
Billed Entity Number:	130751
Funding Year:	2013
Form 471 Application:	924585
Funding Request Number:	2523661
Service:	Internet Access
Service Provider:	ENA Services (SPIN: 143030857)

To Whom It May Concern:

This is an appeal of the denial of the Administrator's Decision on Appeal – Funding Year 2013 – dated December 19, 2013 in connection with the \$300/month reduction in Funding Commitment to FRN 2523661 on 471 Application Number 924585. A copy of the Administrators Decision of Appeal is attached hereto as Exhibit A.

Text Being Requested for Review:

"During the course of the initial PIA review USAC gave the applicant an opportunity to provide additional documentation demonstrating the eligibility of the Firewall service requested and the applicant failed to do so. As a result, USAC modified this funding request to reflect a pre-discount recurring amount of \$8,060.00. On appeal, you did not provide information and/or documentation to prove that USAC's determination was incorrect."

Appeal Review Request:

Frontier School Corporation is appealing USAC's reduction of FRN 2523661, on the premise that documentation was provided that substantiates the Basic Firewall Protection is included as part of the Internet Access and not a separate service.

As stated in the Letter of Appeal (Exhibit B) an error occurred when entering the information on the Item 21 submitted to the SLD for FRN # 2523661 – when the Firewall was erroneously placed on a separate

line from the Internet Access line. The firewall is not a separate service but is included with the internet access as indicated on the quote from ENA Services (Exhibit E) that was provided to USAC in response to the information request and accompanied the Letter of Appeal.

The Schools and Libraries Universal Service Support Mechanism – Eligible Services List – CCDocket No. 02-6; GN Docket No. 09-51 – Released: September 27, 2012 – states on pages 4-5 – Internet Access – Eligible Services - that, “Firewall protection against authorized use and access. Firewall protection may not be provided by a vendor other than the Internet access provider and may not be priced out separately.”

The ENA Services quote (Exhibit E) shows the Basic Firewall Protection is included as part of the Internet Access and not a separate service. This quote accompanied the Response for information Request (Exhibit D) and the Letter of Appeal (Exhibit B).

Given the ENA Services quote for services provided shows the basic firewall protection is included as part of the Internet Access and not a separate service – the funding for the basic firewall protection should be approved for this FRN.

The following exhibits provide evidence that documentation was provided that proves that the Basic Firewall Protection is included as part of the Internet Access and not a separate service.

The School Corporation believes according to the attached Exhibits, USAC erred in reducing funding support for FRN 2523661. The School Corporation believes special consideration to the attached Exhibits clearly show basic firewall protection is included as part of the Internet Access and is not a separate service and that there is no evidence of waste, fraud or abuse, misuse of funds, or a failure to adhere to core program requirements. Furthermore, the School Corporation believes that the denial of E-Rate funds, through the reduction in funding commitment for FRN 2523661 for the full funding year inflicts undue hardship and an approval for FRN 2523661 at the full funding amount of \$100,320.00 would better serve the public interest.

List of Attachments:

- **Exhibit A** – USAC Administrator's Decision on Appeal – FY 2013-2014 – December 19, 2013 – Frontier School Corporation – Application #924585 – FRN 2523661.
- **Exhibit B** – Letter of Appeal – FY 2013-2014 – October 5, 2013 - Application #924585 – FRN 2523661.
- **Exhibit C**- Funding Commitment Decision Letter – September 18, 2013 - Application #924585.
- **Exhibit D** – Response to Information Request – September 9, 2013.
- **Exhibit E** – Quote for ENA Services – Internet Access with Basic Firewall Protection – March 11, 2013.

After review of this appeal, I respectfully request the FCC find that Frontier School Corporation complied with USAC's request for documentation that proves the basic firewall protection is included as part of the Internet Access and is not a separate service. That the School and Libraries Universal Service Support Mechanism – Eligible Services List provides for basic firewall protection when the services are not priced separately as an eligible service for the FRN at issue, and it is in the public interest to provide the requested relief. Frontier School Corporation serves 749 students. The loss of partial funding for FRN 2523661 for basic firewall protection may reduce the ability of the corporation to continuously and consistently provide internet service to its students and employees. Specifically, Frontier School Corporation requests the FCC find that Frontier School Corporation provided documentation that the basic firewall services are included as a service with the Internet Access and not a separate service, as prescribed by the FCC. Thus, the services requested in FRN 2523661 are eligible services. I further request that the funding commitment of \$100,320.00 be fully restored to FRN 2523661.

Thank you for your time and consideration. You are hereby authorized to contact our E-Rate Contact, Bret Lewis, if you have questions concerning this appeal or require additional information. His contact information is as follows:

Authorized person who can best discuss this Appeal:

Bret Lewis

Phone: (765) 918-0370

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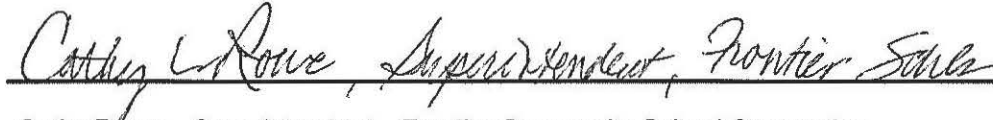
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(preferred mode of contact)

Authorized Signature:

A handwritten signature in cursive script that reads "Cathy L. Rowe, Superintendent, Frontier School". The signature is written over a solid horizontal line.

Cathy Rowe – Superintendent – Frontier Community School Corporation